

OFFICIAL FILE  
ILLINOIS COMMERCE COMMISSION  
STATE OF ILLINOIS

ORIGINAL

ILLINOIS COMMERCE COMMISSION

ILLINOIS  
COMMERCE COMMISSION

2003 OCT -71 A 11:17

CHIEF CLERK'S OFFICE

Illinois Commerce Commission	)	
On Its Own Motion	)	
	)	
vs.	)	03-0582
	)	
Central Illinois Light Company,	)	
	)	
Central Illinois Public Service Company,	)	
	)	
Commonwealth Edison Company,	)	
	)	
Illinois Power Company,	)	
	)	
Interstate Power and Light Company,	)	
	)	
MidAmerican Energy Company,	)	
	)	
Mt. Carmel Public Utility Co.,	)	
	)	
South Beloit Water, Gas, and Electric Company,	)	
	)	
Union Electric Company.	)	
	)	
Investigation concerning the unbundling of	)	
delivery services under Section 16-109 of the	)	
Public Utilities Act.	)	

**PETITION OF MT. CARMEL PUBLIC UTILITY CO. TO INTERVENE**

Now comes Mt. Carmel Public Utility Co., by its attorneys, Koger & Bramlet, P.C., and respectfully seeks leave to intervene in the above captioned proceeding and in support thereof states as follows:

1. Mt. Carmel Public Utility Co. is an Illinois Corporation with its principal place of business located at 316 Market Street, Mt. Carmel, Illinois.

2. Mt. Carmel Public Utility Co. is engaged in the business of distributing and selling electricity and natural gas as a public utility within the meaning of the Illinois Public Utilities Act, 220 ILCS 5/1-101, et seq.

3. The Illinois Commerce Commission initiated the above captioned docket proceeding by Order dated September 22, 2003.

4. The Commission initiated this docket pursuant to Section 16-109 of the Act to further investigate the need for and desirability of different or additional unbundling of delivery services for some or all electric utilities.

5. Mt. Carmel Public Utility Co. is the smallest investor owned utility in the State of Illinois and its needs and positions cannot be adequately represented by any other party.

6. Mt. Carmel Public Utility Co.'s intervention will not delay this proceeding.

WHEREFORE, Mt. Carmel Public Utility Co. respectfully requests leave to intervene in this proceeding.

DATED this 6th day of October, 2003.

Respectfully Submitted,

MT. CARMEL PUBLIC UTILITY CO.



By \_\_\_\_\_  
Eric Bramlet

**VERIFICATION**

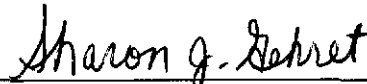
I, Eric Bramlet, first being duly sworn upon oath depose and say that I am Vice President and General Counsel for Mt. Carmel Public Utility Co., an Illinois corporation; that I have read the above and foregoing Petition by me subscribed and know the contents thereof; that said contents are true in substance and in fact, except as to those matters stated upon information and belief, and as to those, I believe same to be true.



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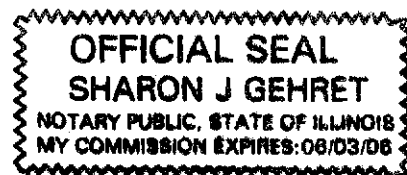
ERIC BRAMLET, Vice President and  
General Counsel

Subscribed and sworn to before me this 6th day of October, 2003.



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Notary Public



Eric Bramlet  
Koger & Bramlet, P.C.  
316 1/2 Market Street  
P.O. Box 278  
Mt. Carmel, Illinois 62863  
Telephone: (618)263-3502  
Facsimile: (618)263-3504  
e-mail: kblaw@midwest.net  
Attorneys for Mt. Carmel Public Utility Co.

STATE OF ILLINOIS

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NOTICE OF FILING AND CERTIFICATE OF SERVICE

TO: See Attached Service List

PLEASE TAKE NOTICE that on the 6th day of October, 2003, Mt. Carmel Public Utility Co. caused to be filed with the Chief Clerk of the Illinois Commerce Commission by depositing in a United States Post Office Box in Mt. Carmel, Illinois, the following documents:

Entry of Appearance  
Petition to Intervene  
Notice of Filing and Certificate of Service

DATED this 6th day of October, 2003.

  
\_\_\_\_\_  
Eric Bramlet, Attorney at Law

CERTIFICATE OF SERVICE

The undersigned attorney does hereby certify that he served a copy of the foregoing listed documents on behalf of Mt. Carmel Public Utility Co., upon all parties listed on the attached Service List, by depositing same, with postage fully prepaid, in a U.S. Post Office box in Mt. Carmel, Illinois on the 6th day of October, 2003.



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Eric Bramlet  
Koger & Bramlet, P.C.  
316 1/2 Market Street  
P.O. Box 278  
Mt. Carmel, IL 62863  
618/263-3502

Service List - Docket No. 03-0582

Darryl Bradford  
Vice President  
Commonwealth Edison Company  
PO Box 805379  
Chicago IL 60680-5379

Eric Bramlet  
Atty. for Mt. Carmel Public Utility  
Koger & Bramlet, P.C.  
316 ½ Market St.  
PO Box 278  
Mt. Carmel IL 62863

Linda M Buell  
Illinois Commerce Commission  
527 E. Capitol Ave.  
Springfield IL 62701

David Eley  
Interstate Power and Light Company  
228 Dancette Dr.  
Rockton IL 61072

Edward C Fitzhenry  
Ameren Corporation  
PO Box 66149 (M/C 1310)  
1901 Chouteau Ave.  
St. Louis MO 63166-6149

Darcy L Hackel  
Regulatory and Restructuring  
Interstate Power and Light Company  
4902 N. Biltmore Ln.  
PO Box 77007  
Madison WI 53707-1007

Robert P Jared  
MidAmerican Energy Company  
106 E. Second St.  
PO Box 4350  
Davenport IA 52808

Joseph L Lakshmanan  
Asst. General Counsel  
Illinois Power Company  
500 S. 27th St.  
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Robert J Mill  
CIPS & UE  
607 E. Adams St.  
Springfield IL 62739

Jeff Schirm  
MidAmerican Energy Company  
716 17th St.  
Moline IL 61265

Nick T Shea  
Director, Rates & Regulatory Affairs  
Central Illinois Light Company  
300 Liberty St.  
Peoria IL 61602

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Vice President  
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1901 Chouteau Ave.  
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Janis Von Qualen  
Illinois Commerce Commission  
527 E. Capitol Ave.  
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